

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
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DOC #:
DATE FILED: 1/24/2020

JANE DOE 1000,

Plaintiff,

v.

DARREN K. INDYKE and RICHARD D. KAHN,
in their capacities as the executors of the
ESTATE OF JEFFREY EDWARD EPSTEIN,

Defendants.

Case No. 1:19-cv-10577-LGS-DCF

**JOINT STIPULATION FOR
ORDER ON PLAINTIFFS' ANONYMITY**

Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together "Defendants"), jointly with Plaintiff Jane Doe 1000 ("Plaintiff"), through counsel for Defendants, respectfully submit this stipulation (the "Stipulation") together with the attached Proposed Order on Plaintiff's Motion For Leave to Proceed Anonymously (the "Proposed Order") and accompanying Non-Disclosure Agreement (the "NDA").

The parties respectfully request the Court enter the Proposed Order and NDA to resolve Plaintiff's Motion For Leave to Proceed Anonymously (ECF #6).

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ORDER ON PLAINTIFF'S ANONYMITY

IT IS HEREBY ORDERED that any person subject to this Order, including the parties to this action and their respective counsel of record, shall adhere to the following terms:

1. Within three (3) days of entry of this Order, Counsel of Record for Plaintiff shall disclose Plaintiff's identity to Counsel of Record for Defendants, in writing.
2. Counsel of Record for Defendants may disclose Plaintiff's identity only to Defendants and any attorneys, paralegals, and clerical or other assistants working with or for Defendants on matters related to this action; and the recipients of such information shall not disclose it to any other persons.
3. If Defendants wish to disclose Plaintiff's identity to any person not otherwise permitted to receive such information under this Order, Defendants are limited to doing so in connection with defending this action, and must require such person to first execute a non-disclosure agreement, in a form agreed to by the parties, that prevents such person from disclosing Plaintiff's identity to any other persons. Defendants must maintain a list of all such persons to whom Plaintiff's identity is disclosed and copies of the executed non-disclosure agreements, all of which are subject to *in camera* inspection.
4. All portions of pleadings, motions or other papers filed with the Court that disclose Plaintiff's identity shall be filed under seal with the Clerk of the Court and kept under seal until further order of the Court. The parties shall use their best efforts to minimize such sealing. Any party filing a motion or any other papers with the Court under seal shall also publicly file a redacted copy of the same, via the Court's Electronic Case Filing system, that redacts the Plaintiff's identity and text that would reveal Plaintiff's identity.
5. The parties may seek to modify or amend this Order at any time upon motion to the Court or by stipulation.

SO ORDERED: DATE: 1/24/2020

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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Date: New York, New York

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NON-DISCLOSURE AGREEMENT

I, _____, acknowledge that I understand that the identity of the Plaintiff in this action is confidential. I agree that: (1) I will hold in confidence Plaintiff's identity; (2) I will use Plaintiff's identity only in connection with this litigation; and (3) I will take all due precautions to prevent the unauthorized or inadvertent disclosure of Plaintiff's identity.

By acknowledging these obligations under this Non-Disclosure Agreement, I understand that I am submitting myself to the jurisdiction of the United States District Court for the Southern District of New York for the purpose of any issue or dispute arising hereunder, and that my willful violation of any term of the Non-Disclosure Agreement could subject me to punishment for contempt of court.

Dated:

[Signature]